

HURRELL CANTRALL LLP  
800 WEST 6TH STREET, SUITE 700  
LOS ANGELES, CA 90017-2710  
TELEPHONE (213) 426-2000

1 Thomas C. Hurrell, State Bar No. 119876  
E-Mail: [thurrell@hurrellcantrall.com](mailto:thurrell@hurrellcantrall.com)  
2 Janet J. Hur, State Bar No. 330358  
E-Mail: [jhur@hurrellcantrall.com](mailto:jhur@hurrellcantrall.com)  
3 Jerad J. Miller, State Bar No. 334001  
E-Mail: [jjmiller@hurrellcantrall.com](mailto:jjmiller@hurrellcantrall.com)  
4 HURRELL CANTRALL LLP  
800 West 6th Street, Suite 700  
5 Los Angeles, California 90017  
Telephone: (213) 426-2000  
6 Facsimile: (213) 426-2020

7 Attorneys for Defendants, COUNTY OF LOS ANGELES, MARISOL BARAJAS  
and HECTOR VAZQUEZ  
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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 JENNIE QUAN, individually and as  
13 successor in interest to BENJAMIN  
14 CHIN, deceased,

15 Plaintiff,

16 v.

17 COUNTY OF LOS ANGELES;  
MARISOL BARAJAS; HECTOR  
18 VAZQUEZ; and DOES 3-10, inclusive,

19 Defendants.

Case No. 2:24-cv-04805-MCS(KSx)

**JERAD MILLER'S DECLARATION  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT, OR PARTIAL  
SUMMARY JUDGMENT**

[Assigned to Hon. Mark C. Scarsi,  
Courtroom "7C"]

20  
21 **DECLARATION OF JERAD MILLER**

22 1. I am an attorney duly licensed to practice before this Court and am an  
23 associate with Hurrell Cantrall LLP, attorneys of record for DEFENDANTS THE  
24 COUNTY OF LOS ANGELES, MARISOL BARAJAS, AND HECTOR VAZQUEZ  
25 herein.

26 2. The facts set forth herein are of my own personal knowledge and if sworn  
27 I could and would testify competently thereto.

28 3. I make this declaration in support of Defendants' Motion for Summary

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Judgement, or in the alternative, Motion for Partial Summary Judgment.

4. On September 19, 2025, I initiated formal meet and confer efforts with Plaintiff's attorney of record, Ms. Hang Le, regarding Defendants' intent to file a motion for summary judgment or partial summary judgment. On September 22, 2025, myself and Ms. Hang Le held a telephonic conference call and met and conferred on the substantive issues regarding the instant motion. **Attached hereto as Exhibit G is a true and correct copy of the September 19, 2025 formal meet and confer email.**

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 29, 2025, at Los Angeles, California.

/s/ Jerad J. Miller  
Jerad Miller

# Exhibit G

**Archived:** Monday, September 29, 2025 1:40:31 PM

**From:** Jerad Miller

**Sent:** Fri, 19 Sep 2025 21:03:56 +0000Authentication

**To:** [Hang Le](#); [Dale Galipo](#); [Santiago Laurel](#)

**Cc:** [Thomas Hurrell](#); [Maricela Gomez](#); [Janet J. Hur](#); [Theresa Cana](#)

**Subject:** Quan v. County of Los Angeles, et al. Meet and Confer

**Importance:** Normal

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Good afternoon Counsel,

As we discussed at Deputy Toves' deposition yesterday, we intend to stipulate to a discovery continuance. Out of an abundance of caution, we are preserving our right to file a motion for summary judgment on qualified immunity grounds and are requesting to meet and confer.

Local Rule 7-3 requires that we meet and confer at least 7 days prior to the filing of any such motion. The current Rule 56 motion cut-off is September 29, 2025. Please let us know if you have any availability later today, or Monday, for a telephone call to discuss the motion.

Best regards,

Jerad J. Miller

Attorney

**Hurrell Cantrall LLP**

800 West 6th Street, Suite 700

Los Angeles, CA 90017-2710

Tel: (213) 426-2000

Fax: (213) 426-2020

[jjmiller@hurrellcantrall.com](mailto:jjmiller@hurrellcantrall.com)

\*\*\*WE'VE MOVED! PLEASE NOTE THE FIRM'S NEW ADDRESS EFFECTIVE THURSDAY, 06/26/2025\*\*\*

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